

LONG & ASSOCIATES
NY / LA / SF

RYAN E. LONG ESQ.
RLONG@LANDAPLLC.COM

MEMORANDUM ENDORSED

February 28, 2022

Via ECF

Honorable Gregory H. Woods
United States District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St. – Room 2260
New York, NY 10007

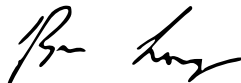
USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 2/28/2022
--

Re: Capital Markets Placement Inc. v. Neuvoov Inc. and Talent.com Inc., Civil Action
No. 1:21 – cv – 06845

Dear Judge Woods:

My office represents Plaintiff Capital Markets Placement, Inc. (“CMP”). Per Your Honor’s individual rules (1)(A) and (2)(C), Plaintiff writes to request permission to file a new motion to dismiss Defendant’s Amended Answer & Counterclaims. *See* Docket #45. As with the first motion, this new motion is not on consent. Your Honor issued an Order setting forth a briefing schedule for the first motion. *See* Docket #25. The grounds for the second motion are the same. *See* Docket #23 (Plaintiff’s letter requesting a pre-motion conference) and ##40 – 44 (Plaintiff’s first motion). Plaintiff intends on filing the second motion on or before March 14th, per rule 3(d) of Your Honor’s individual rules. The parties are not opposed to the briefing schedule in Local Rule 6.1.

Sincerely,



Ryan E. Long


Cc: Mr. Boris Rozman (via Electronic Mail)

Plaintiff’s request to file a motion to dismiss Defendants’ amended answer and counterclaims, Dkt. No. 45, is granted. Plaintiff’s motion is due no later than March 14, 2022. Defendants’ response is due within 21 days after service of that motion. Plaintiff’s reply, if any, is due within 7 days after service of that motion. In addition, Plaintiff’s first motion to dismiss Defendant’s answer and counterclaims, which was filed prior to the filing of the amended answer and counterclaims, is denied as moot.

The Clerk of Court is instructed to terminate the motion at Dkt. No. 40.

SO ORDERED.

Dated: February 28, 2022
New York, New York


GREGORY H. WOODS
United States District Judge